

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

JOSEPH D. WARD,

Plaintiff,

v.

CLIENT RESOLUTION  
MANAGEMENT, LLC,

Defendant.

Case No. 1:19-cv-00460-MAC

Honorable Marcia A. Crone

**MOTION TO EXTEND DEADLINE TO FILE DISMISSAL DOCUMENTS**

JOSEPH D. WARD (“Plaintiff”), by and through his attorneys, Sulaiman Law Group, Ltd., moves this Court to extend the deadline to file dismissal documents, and in support thereof, state as follows:

1. On November 14, 2019, Plaintiff and CLIENT RESOLUTION MANAGEMENT, LLC (“Defendant”) reached settlement and notified this Honorable Court of this agreement [Dkt. No. 6].
2. On November 15, 2019, this Court, pursuant to parties’ settlement ordered both parties to file their dismissal documents by January 14, 2019. [Dkt. No. 9].
3. Parties, however, remains in the process of meeting the conditions set forth in the settlement agreement and requires an additional 60 days to complete this process.

WHEREFORE, Plaintiff respectfully requests the Court extend the deadline to file dismissal documents to March 21, 2020, and grant any other relief deemed appropriate and equitable.

Dated: January 21, 2020

Respectfully submitted,

/s/ Nathan C. Volheim

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**CERTIFICATE OF CONFERENCE**

On the 21<sup>st</sup> day of January, 2020, the Plaintiff's counsel contacted Defendant's lead counsel, Michael Jablonski, via email to confer about the Plaintiff's Motion to Extend Deadline to File Dismissal . However, Plaintiff's counsel did not receive a response to his email.

**CERTIFICATE OF SERVICE**

I, Nathan C. Volheim, an attorney, hereby certify that on January 21, 2020, the foregoing **PLAINTIFF'S MOTION TO EXTEND DEADLINE TO FILE DISMISSAL DOCUMENTS** was filed with the Clerk of the Court of the United States District Court for the Eastern District of Texas by using the CM/ECF system. I certify that all participants in this case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Woods Oviatt Gilman  
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/s/ Nathan C. Volheim

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